

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., *et al.*,  
Debtors.

Chapter 11

Case No. 01-01139 (JKF)  
Jointly Administered

**Related Docket Nos.: 23018, 23047, 23070, 23087, 23217**

**CERTIFICATION OF COUNSEL REGARDING STIPULATION  
BY AND BETWEEN ARROWOOD, MARYLAND CASUALTY COMPANY, CNA  
COMPANIES AND THE LIBBY CLAIMANTS RESOLVING ARROWOOD'S MOTION  
TO STRIKE, AND OBJECTIONS TO, THE LIBBY CLAIMANTS DEPOSITION  
DESIGNATIONS OF DEPOSITIONS OF TWENTY ONE INDIVIDUAL CLAIMANTS  
TAKEN OUTSIDE THE BANKRUPTCY**

I, Garvan F. McDaniel, of Bifferato Gentilotti LLC, co-counsel to Arrowood Indemnity Company f/k/a Royal Indemnity Company ("Arrowood"), certifies as follows:

1. On or about August 28, 2009, Arrowood filed its *Motion to Strike, and Objections to, the Libby Claimants' Designation of the Depositions of Twenty-One Individual Claimants Taken Outside the Bankruptcy* (the "Motion") [Docket No. 23018].
2. On or about August 31, 2009, CNA Companies filed a joinder to the Motion [Docket No. 23047].
3. On or about September 2, 2009, Maryland Casualty Company filed a joinder to the Motion [Docket No. 23087].
4. On or about September 1, 2009, the Libby Claimants filed a preliminary response to the Motion [Docket No. 23070].
5. On or about September 10, 2009, the Libby Claimants filed a response to the Motion [Docket No. 23217].

6. Arrowood, Maryland Casualty Company, CNA Companies and the Libby Claimants have agreed to resolve the Motion by entering into a Stipulation attached hereto as Exhibit A (the "Stipulation").

WHEREFORE, Arrowood respectfully request that the Court approve the Stipulation by entering the proposed Order attached hereto.

Dated: September 22, 2009  
Wilmington, Delaware

By: /s/ Garvan F. McDaniel  
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